

March 19, 2018

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Rider 10,
Demand-Side Management and Energy Efficiency for 2019;
Docket No. 2018-72-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. and Sam's East, Inc. (collectively, "Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton
(SC Bar No. 80073)

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Counsel to Walmart Inc. and Sam's East, Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-72-E

IN RE:)	
)	
Application of Duke Energy Carolinas, LLC)	PETITION TO INTERVENE OF
for Approval of Rider 10, Demand-Side)	WALMART INC. AND
Management and Energy Efficiency for 2019)	SAM'S EAST, INC.

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On March 2, 2018, Duke Energy Carolinas, LLC ("Company" or "DEC"), filed an Application for approval of Rider 10, Demand-Side Management ("DSM") and Energy Efficiency ("EE") for 2019 ("Application"). The Application was filed pursuant to S.C. Code Ann. Section 58-37-20 (2015), 10 S.C. Code. Reg. 103-819 and 823 (2012), the Rule of Practice and Procedure of the Public Service Commission of South Carolina.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-0550.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DEC. Walmart has approximately 37 facilities in South Carolina that are served by DEC, which include Walmart Supercenters, Sam's

Clubs, gas stations, one return center, and one distribution center. Walmart purchases approximately 122 million kWh annually from DEC. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DEC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and EE and therefore is very interested in this case and has participated in similar cases in the past.

4. In addition, Walmart believes that DEC and the Commission should explore modifying DEC's opt-out timing and procedures so that they are consistent with those of Duke Energy Progress in South Carolina. Walmart intends to provide Comments to the Commission in that regard.

5. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DEC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

6. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Brandfass be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson and/or Ms. Brandfass to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson and Ms. Brandfass be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Counsel to Walmart Inc. and Sam's East, Inc.

Dated: March 19, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-72-E

IN RE:)	
)	
Application of Duke Energy Carolinas, LLC)	CERTIFICATE OF SERVICE
for Approval of Rider 10, Demand-Side)	
Management and Energy Efficiency for 2019)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: March 19, 2018